

LEE ROBERT ARZT ATTORNEY AT LAW

EXHIBIT A
AMENDED

Invoice

6802 Paragon Place
Suite 220
Richmond, VA 23230

Date	Invoice #
12/2/2014	46

Bill To
Dean and Michele Miller 13115 Densmore Place Richmond, VA 23233

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	AMENDED INVOICE 1-6-15		
1	3/4/2014 Consulting and analyzing the estate affect on bankruptcy	375.00	375.00
0.7	3/18/2014 Telecon with estate counsel in NYC	375.00	262.50
0.7	3/18/2014 Telecon with Chapter 13 Trustee advising of death of father	375.00	262.50
0.2	3/24/2014 Telecon with Larry Braunstein at Morgan Stanley regarding estate (info gathering)	375.00	75.00
0.4	3/24/2014 Telecon with FL Est Attorney and his assistant (info gathering)	375.00	150.00
1	3/24/2014 Consulting with clients regarding plans	375.00	375.00
1.3	5/27/14 Review entire financial situation	375.00	487.50
1.5	5/27/14 Drafting letter to Trustee	375.00	562.50
0.4	5/27/2014 Consulted with Chapter 13 Trustee	375.00	150.00
0.3	6/2/2014 Redrafted letter to Chapter 13 Trustee (regarding fine-tuning economic representations)	375.00	112.50
0.2	6/4/2014 Emails to clients writing and sending	375.00	75.00
0.1	6/4/2014 Emails to Chapter 13 Trustee writing and sending	375.00	37.50
3	7/2/2014 Drafting Settlement Agreement with FL Est Attorney and Trustee as parties	375.00	1,125.00
1.5	7/18/2014 Consulting with client	375.00	562.50
0.1	7/25/2014 Telecon with clients and set up file with court	375.00	37.50
1.8	7/29/2014 Redraft of Settlement Agreement to eliminate FL estate and Trustee	375.00	675.00
0.2	7/29/2014 Telecon with clients	375.00	75.00
0.1	7/29/2014 Telecon with Chapter 13 Trustee	375.00	37.50
0.2	7/29/2014 Emailed revised agreement to Chapter 13 Trustee (done directly by counsel to avoid same time to be spent directing paralegal to send)	375.00	75.00
2.2	8/4/2014 Drafting of motion and sketch of order and finalizing agreement	375.00	825.00
2	9/3/2014 Travel to Court for Hearing and attend Hearing to approve Settlement Agreement	375.00	750.00
3	10/27/2014 Reviewing documentation and drafting letters and forms authorizing disbursement of funds from Jackson, Phoenix and MetLife policies	375.00	1,125.00
2.6	10/28/2014 Meeting and Consulting with clients and filling out all missing info on necessary forms	375.00	975.00
		Total	

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Quantity	Description	Rate	Amount
2.3	11/6/2014 Travel back and forth to meet Michele and To banks to get money deposited and cleared	375.00	862.50
1.8	11/10/2014 Telecon with banks regarding release of funds	375.00	675.00
0.2	11/12/2014 Telecon with Chapter 13 Trustee to advise regarding status of funding to be released	375.00	75.00
0.2	11/12/2014 Telecon with client regarding what is needed to get funds requested	375.00	75.00
0.3	11/14/2014 Telecon with clients Dean and Michele regarding what is needed to process funds requested	375.00	112.50
0.1	11/17/2014 Telecon with Chapter 13 Trustee about release of funds	375.00	37.50
0.1	11/17/2014 Telecon with client regarding funding transfer	375.00	37.50
0.2	11/17/2014 Emails writing and sending to clients and trustee	375.00	75.00
0.6	11/17/2014 Telecon with Michele explaining where they are in the process and paying Ch 13 Trustee	375.00	225.00
0.2	11/18/2014 Telecon with Michele regarding transfer of funds	375.00	75.00
0.2	11/18/2014 Telecon with bank regarding funds collected for Millers	375.00	75.00
0.3	11/21/2014 Writing checks and letter to Trustee	375.00	112.50
0.2	11/21/2014 Texting Michele to let her know what has been done	375.00	75.00
		Total	\$11,700.00

Exhibit A Addendum

LEE ROBERT ARZT
ATTORNEY-AT-LAW
6802 PARAGON PLACE, STE 220
RICHMOND, VA 23230

Time Charges
from Inception of File on 3/31/2009
to 3/4/2014, (reconstructed)

The husband comes to the office in late March 2009 with significant debt problems arising from one or more failed business attempts intending to capitalize on husband's status as a former "Mr. America," being a very successful body builder and individual fitness trainer, with an almost 40 year relationship with the firm.

As the client is not traditionally business trained or oriented his affairs are not in order and considerable time is spent reconstructing his obligations at the time of engagement. The number of creditors is prodigious, estimated at about 60 listed creditors. The client is not focused on carrying through with filing and the time spent went through no less than two and much more likely three cycles of preparation before filing, leaving counsel with the clear impression that the hourly fees were in the range of between \$6,000 and \$7,000 at the time of the conclusion of the § 341 hearing. The filing in February 2010 was successful and a Chapter 13 Plan which was duly confirmed. Payments were made from the time of filing to the point where the Court approved a settlement agreement between the Chapter 13 Trustee and the debtors, a period of about 4 years. At which time payments were Ordered suspended by the Court.

During the period, there were times of intense negotiations with secured lenders ultimately leading to temporary loan relief. From time to time clients raise questions that need responses which are made appropriately.

Although the Rules and Orders of the Court permit law offices to charge \$3,000 for representation in Chapter 13 with no required application for fees, this office tries to grant a discount to economically stressed individuals and usually charges but \$2,500 for these services, as was done in the case at bar.

Detail:

March 31, 2009 - Initial office visit with client, explain the options available to client. Attempt to do pro forma income and expense statement, general review of assets and debts, make disclosures required by law, deal with 3 way merged credit report requirement, classes and explain the collection of information required to pursue relief.	1.8 hours
April 2, 2009 - Office visit to review materials assembled by client regarding assets and debts, and commence to input information into Collier Topform during long question and answer session with client.	4.3 hours

April 6 th , 2009	Continue to question and answer session with client to complete first run through of bankruptcy forms.	2.5 hours
April 9 th , 2009	Run a complete set of filing forms.3 hours
April 9 th , 2009	Prepare a draft of a Chapter 13 Plan.	1.6 hours
April 12 th , 2009	Meet with Client at office to review schedules, petition, statement of financial affairs, etc. and draft of plan (client left with documents for review) so time only reflects attorney time.8 hours
First cycle of activity.		11.3 hours
<p>During the next months, the debtor came and went asking questions in person and on the telephone preparatory to updating responses and filing for relief. It is believed that no less than 5 hours were spent answering questions and requesting follow up information in order to complete the filing. It is during this period that another cycle of activity is believed to have been expended. In addition it is believed that the Chapter 13 Plan went through more revisions.</p>		
		NO CHARGE
January 15 th , 2010	Office visit with client, review the options available to client. Attempt to review numbers for income and expense statement, general review of assets and debts, make disclosures required by law, deal with 3 way merged credit report requirement, classes and explain the need to update all information required to pursue relief.	1.0 hours
January 19, 2010	Office visit to review materials assembled by client to update assets and debts, and commence to review and update information previously inputted into Collier Topform during question and answer sessions with client.	2.8 hours
February 11, 2010	Run a complete set of filing forms.3 hours
February 11, 2010	Prepare another draft of a Chapter 13 Plan.	1.5 hours
February 19, 2010	Meet with Client at office to review schedules, petition, statement of financial affairs, etc. and draft of plan (client left with documents for review) so time only reflects attorney time.8 hours
April 8, 2010	Travel to and attend Section 341 First Meeting of Creditors	2.5 hours
Miscellaneous	Responses to general checklists and requests of the Court.	NO CHARGE
Attendance at various hearings where secured lenders attempted to get relief from stay. . .		NO CHARGE
Second cycle of activity		8.9 hours

First cycle of time expended.11.3 hours
Second cycle of time expended.8.9 hours

Total legal hours charged.20.2hours

At the time the case commenced in 2009, counsel's hourly rate was \$350 per hour, so we are applying that rate to this time in distinction to the more current rate of \$375 per hour.

\$350.00 times 20.2 hours yields a total of \$7,070 in legal time for which counsel received \$2,500.00

/s/ Lee Robert Arzt